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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

29
30 NATIONAL URBAN LEAGUE, *et al.*,

31 Plaintiff,

32 v.

33 WILBUR L. ROSS, JR., *et al.*,

34 Defendants.

35 Case No. 5:20-cv-05799-LHK

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37
38 **SECOND DECLARATION OF
KATHLEEN M. STYLES**

1 I, Kathleen M. Styles, make the following Declaration pursuant to 28 U.S.C. § 1746, and
2 state that under penalty of perjury the following is true and correct to the best of my knowledge
3 and belief:

4 1. I currently serve as the Chief, Decennial Communications and Stakeholder Relationships
5 in the Census Bureau; my job responsibilities include overseeing production of documents and information from the Census Bureau in response to the Plaintiffs in this lawsuit.

6 2. This is my second declaration in this lawsuit. I submit this declaration in response
7 to the Court's Case Management Order dated January 11, 2021 (ECF 444) directing Defendants
8 to file a declaration explaining how and when the Data Quality Executive Guidance Group's
9 ("Data Quality EGG") documents were collected and identifying the documents produced from
10 this group. The information in this declaration is based upon my personal knowledge and information I obtained in the course of my official duties.

11 3. The Census Bureau's Data Quality EGG documents are maintained by Jennifer
12 Ortman. Approximately once a week she emails the documents from the prior week's meetings
13 to my staff, and copies me. We then periodically produce them to counsel at the Department of
14 Commerce ("DOC") for production to Plaintiffs in this lawsuit.

15 4. Before turning these documents over to counsel for production, we first review
16 them for to determine if they contain confidential Title 13 data. Those that contain Title 13 data
17 we send to the Disclosure Review Board ("DRB") for their review and potential redaction prior to
18 production. The DRB process ensures that information produced released by the Census Bureau
19 adhere to the confidentiality requirements of Title 13 and other applicable statutes. After review,
20 the DRB appends a DRB release number to the document.

21 5. The attached shows the dates we provided documents to DOC. The recently-filed
22 declaration from Megan Heller (ECF 445-1) indicates that documents from the Data Quality EGG
23 were uploaded to Kiteworks, the DOC secure file collaboration site, on the following days:

24 a. 12 documents related to the Data Quality EGG were uploaded November 25
25 b. One document related to the Data Quality EGG was uploaded November 30

- c. Four documents related to the Data Quality EGG were uploaded December 10
- d. 28 documents related to the Data Quality EGG were uploaded were uploaded December 14
- e. Six documents related to the Data Quality EGG were uploaded on January 11, 2021

6. In addition to the documents listed above, I understand that DOC will produce on January 14, 2021 the Data Quality EGG documents that we provided to DOC the prior day.

7. I have read the foregoing and it is all true and correct.

DATED this ____ day of January, 2021

Kathleen M. Styles

Chief, Decennial Communications and Stakeholder Relationships

Attachment: List of Data Quality EGG documents provided